

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21 MC 102 (AKH)

JULIO HURTADO (AND WIFE, ELDA MONICA  
MONTES),

07-CV-5295 (AKH)

Plaintiffs,

-against-

100 CHURCH LLC, ET AL.,

**NOTICE OF ADOPTION BY  
ZAR REALTY  
MANAGEMENT CORP. OF  
ANSWER TO MASTER  
COMPLAINT**

Defendants.

---

**PLEASE TAKE NOTICE** that defendant **ZAR REALTY MANAGEMENT CORP.** **n/k/a SAPIR REALTY MANAGEMENT CORP.** for the building located at 100 Church Street, (hereinafter “Zar/Sapir”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Zar/Sapir’s Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006

***Liaison Counsel for the Defendants***

All Other Defense Counsel

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on September 10, 2007, I caused the following document to be electronically via the Court's ECF system:

1. Notice of 100 Church LLC's Adoption of Amended Answer to Master Complaint.

The undersigned further certifies that on September 10, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

***Liaison Counsel for Plaintiffs***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006

***Liaison Counsel for the Defendants***

Dated: September 10, 2007

\_\_\_\_\_  
/s/  
Stanley Goos, Esq. (SG 7062)